

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

GORDON ERNST,

Defendant.

Case No. 1:19-cr-10081-IT

**ASSENTED TO MOTION TO MODIFY
CONDITIONS OF PRETRIAL RELEASE**

Defendant Gordon Ernst hereby moves this Court to modify his conditions of release to allow him to reside in Rockville, Maryland with his wife and daughter. The Ernsts moved to Massachusetts when they had to sell their home in Chevy Chase, Maryland but their youngest daughter did not adapt well to having to leave her school and friends, so they decided to return to Maryland. Mr. Ernst was permitted free travel between Massachusetts and Maryland and was traveling back and forth frequently but now wants to spend as much time as possible with his wife and daughter.

Defense counsel has consulted with AUSA Kriss Basil and Probation Officer Kylie Fucci, who both assent to this Motion.

Dated: September 15, 2021

Respectfully submitted,

GORDON ERNST

By his attorney,

/s/ Tracy A. Miner

Tracy A. Miner (BBO No. 547137)
Miner Siddall LLP
101 Federal Street, Suite 650
Boston, MA 02110
Tel.: (617) 202-5890
Fax: (617) 202-5893
tminer@msdefenders.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served by ECF on counsel for all parties on September 15, 2021.

/s/ Tracy A. Miner

Tracy A. Miner